I.D. 06184818 File No. 3900-042

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS Eastern Division

J&J SPORTS PRODUCTIONS, INC.,)	
Plaintiff,)	
v.)	08 C 2577
)	
JUAN M. REYES, individually and d/b/a)	Judge Kendall
LA QUINTA DE LOS REYES, INC., d/b/a)	
LA QUINTA DE LOS REYES and LA)	Magistrate Judge Veldez
QUINTA DE LOS REYES, INC., d/b/a)	
LA QUINTA DE LOS REYES,)	
Defendants.)	

PLAINTIFF'S MOTION FOR DEFAULT

NOW COME the Plaintiff, J&J SPORTS PRODUCTIONS, INC., by and through its attorneys, ZANE D. SMITH & ASSOCIATES, LTD., and respectfully requests that this Court enter an order of default judgment against Defendants, JUAN M. REYES, indv. and d/b/a LA QUINTA DE LOS REYES, INC., d/b/a LA QUINTA DE LOS REYES, INC., d/b/a LA QUINTA DE LOS REYES, and in support thereof, states as follows:

- 1. On May 29, 2008 JUAN M. REYES, indv. and d/b/a LA QUINTA DE LOS REYES, INC., d/b/a LA QUINTA DE LOS REYES were served with summons and complaint in this matter (*A copy of the Returns of Service are attached hereto as Exhibit "A"*).
- 2. As of the date of the filing of this motion, Defendants, JUAN M. REYES, indv. and d/b/a LA QUINTA DE LOS REYES, INC., d/b/a LA QUINTA DE LOS REYES, INC., d/b/a LA QUINTA DE LOS REYES, have failed to file an appearance and/or answer in this matter.

WHEREFORE, Plaintiff, J&J SPORTS PRODUCTIONS, INC., pray this Honorable Court enter an order of default judgment against Defendant, JUAN M. REYES, indv. and d/b/a LA QUINTA DE LOS REYES, INC., d/b/a LA QUINTA DE LOS REYES, INC., d/b/a LA QUINTA DE LOS REYES and set this matter for a prove up

against Defendant, JUAN M. REYES, indv. and d/b/a LA QUINTA DE LOS REYES, INC., d/b/a LA QUINTA DE LOS REYES, INC., d/b/a LA QUINTA DE LOS REYES and for any additional relief this Court deems just.

> s/Zane D. Smith Zane D. Smith

CERTIFICATE OF SERVICE

I, Zane D. Smith, on oath state that a true and correct copy of the Notice of Filing was electronically filed with the Clerk of the Court on August 28, 2008, using the CM/ECF system which will send notification of such filing(s) to all attorneys of record. Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

> //s/ Zane D. Smith Zane D. Smith

Zane D. Smith ZANE D. SMITH & ASSOCIATES, LTD. 415 North LaSalle Street - Suite 300 Chicago, Illinois 60610 (312) 245-0031 (312) 245-0022 - Fax

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Filed 07/03/2008

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AO 440 (Rev. 05/00) Summons in a Civil Action

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

U.S. Dish

SUMMONS IN A CIVIL CASE

J&J SPORTS PRODUCTIONS, INC.

CASE NUMBER:

08CV2577

٧.

ASSIGNED JUDGE:

JUDGE KENDALL

MAGISTRATE JUDGE VALDEZ

Juan M. Reyes, indv. and d/b/a La Quinta De Los Reyes, Inc., d/b/a La Quinta De Los Reyes and La Quinta De Los Reyes, Inc., d/b/a La Quinta De Los Reyes

DESIGNATED

MAGISTRATE JUDGE:

TO: (Name and address of Defendant)

Juan M. Reyes 1135 Dickens Naperville, Illinois 60563

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

Zane D. Smith & Associates, Ltd. 415 N. LaSalle Street - Suite 300 Chicago, Illinois 60610

an answer to the complaint which is herewith served upon you, within	20	_days after service of this
summons upon you, exclusive of the day of service. If you fail to do so	o, judgment by default v	vill be taken against you for the
relief demanded in the complaint. You must also file your answer with t	he Clerk of this Court wi	thin a reasonable period of time
after service.		

NOTE: When the print dialogue box appears, be sure to uncheck the Annotations option.

Michael W. Dobbins, Clerk

May 6, 2008

Date

(By) DEPUTY CLERK



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AO 440 (Rov. 05/00) Summons in a Civil Action RETURN OF SERVICE DATE Service of the Summons and complaint was made by me⁽¹⁾ NAME OF SERVER (PRINT) Me W) illiams WALTER Check one box below to indicate appropriate method of service G Served personally upon the defendant. Place where served: G) G Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein. Name of person with whom the summons and complaint were left: G Returned unexecuted: JUAN M REYES G Other (specify): <FFT COPIES ROTH A MAKE HIPALIA STATEMENT OF SERVICE FEES TRAVEL SERVICES TOTAL **DECLARATION OF SERVER** I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct. Walter MeW ullianis

Signature of Server

ME RO SERVICE 4647 W 103Rd ST OAK CAWN, FULLNOS 60453

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Filed 07/03/2008

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AO 440 (Rev. 05/00) Summons in a Civil Action

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS



SUMMONS IN A CIVIL CASE

J&J SPORTS PRODUCTIONS, INC.

CASE NUMBER:

08CV2577

~**~**.

JUDGE KENDALL

ASSIGNED JUDGE:

MAGISTRATE JUDGE VALDEZ

Juan M. Reyes, indv. and d/b/a La Quinta De Los Reyes, Inc., d/b/a La Quinta De Los Reyes and La Quinta De Los Reyes, Inc., d/b/a La Quinta De Los Reyes

V.

DESIGNATED

MAGISTRATE JUDGE:

TO: (Name and address of Defendant)

La Quinta De Los Reyes, Inc., d/b/a La Quinta De Los Reyes c/o Juan M. Reyes - Registered Agent 1135 Dickens Naperville, Illinois 60563

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

Zane D. Smith & Associates, Ltd. 415 N. LaSalle Street - Suite 300 Chicago, Illinois 60610

an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

NOTE: When the print dialogue box appears, be sure to uncheck the Annotations option.

Michael W. Dobbins, Clerk

(By) DEPUTY CLERK

May 6, 2008

Date



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Document 8 Filed 07/03/2008 Page 2 of 2 Case 1:08-cv-02577 AO 440 (RCv. 05/00) Summons in a Civil Action RETURN OF SERVICE Service of the Summons and complaint was made by me(1) NAME OF SERVER (PRIN Check one box below to indicate appropriate method of service G Served personally upon the defendant. Place where served: G Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein. Name of person with whom the summons and complaint were left: G Returned unexecuted: LAQUINTA DE LOS REYES, THE DIBJA LA QUINTA DELOS REYES Gother (specify): LEFT COPIES WITH A MALE HISTAINE 40'S
WHO WOULD NOT IDENTIFY HIM SELF AT 1135 DICKERS STATEMENT OF SERVICE FEES TRAVEL SERVICES TOTAL DECLARATION OF SERVER I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct. Walter McWilliams ChMETRG Signature of Server 4641 W 103Rd ST OAK LAWN ILLINOIS 6063 Address of Server